

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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U.S. DISTRICT COURT  
DISTRICT OF MASS.

UNITED STATES OF AMERICA, )  
Plaintiff )  
v. )  
ROMAN ZHIRNOV, )  
Defendant )

CRIMINAL INDICTMENTS  
NO. 02-30043-MAP

**DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS**

Now comes the Defendant, Roman Zhirnov, by his attorney, and in the interests to achieve a fair and impartial jury who are indifferent in this case and not influenced by bias, prejudice or interest hereby submits the following Defendant's Proposed Voir Questions for consideration by the Court to be read to each prospective member of the jury.

1. Have you ever been a member of any police force, law enforcement agency, United States Attorney's Office, security agency or any organization whose primary purposes are related to law enforcement?
2. Do you have any relatives or close friends who are member of any police force, law enforcement agency, United States Attorney's Office, security agency or any organization whose primary purposes is related to law enforcement? Describe any such relationship and any influence such a relationship would have on your ability to decide this case fairly.
3. During this trial it is expected that there will be testimony by law enforcement officers. Are you able to listen to the evidence fairly? Would you tend to believe the testimony of law

enforcement officer because of his status in law enforcement over the testimony of a witness who is not related to law enforcement?

4. Have you or any of your friends or relatives been employed by any governmental agency? If so, describe any such relationship and any influence such a relationship would have on your ability to decide this case fairly.

5. Have you or any of your friends or relatives been the victims of crimes? If so, please describe your experiences or your feelings about those experiences. Do you believe the illegal use of guns or knives contributed to those incidents?

6. Do you or any of you friends or relatives belong to any groups or organizations that have any purpose including the control or removal of individual gun ownership? If so, would such experiences or feelings affect your ability to decide this case fairly and impartially?

7. Have you ever sat on a jury in a federal or state criminal case? When was such service provided? Did that experience in any way affect your ability to decide this case fairly and impartially?

8. Have you or any friends or relatives ever been a witness for the prosecution of any case? If so, please describe your experiences or your feelings about those experiences.


9. Roman Zhirnov is a defendant in this case and is of Russian heritage. Do you have any opinions or beliefs about any people of Russian heritage? Have you had any uncomfortable or upsetting experiences with anyone who was of Russian heritage? Will the defendant's Russian heritage affect your ability to decide this case fairly and impartially?

8. During the trial, an interpreter will assist Roman Zhirnov. Do you believe that persons of foreign origin who live in the United States should learn the English language and should be required to speak English in public places?

9. Under our law, a defendant is presumed to be innocent and that presumption alone is sufficient to acquit anyone charged with a crime. Do any of you, as prospective jurors, feel that the nature of the charge has any bearing on the existence of the presumption of innocence? Do you believe in any way that since Roman Zhirnov is a defendant in this case that he must have done something wrong or will you be able to truly presume he is innocent of these charges unless the Government can prove his guilt beyond a reasonable doubt?

Dated: November 11, 2005


THE DEFENDANT,  
ROMAN ZHIRNOV,  
BY HIS ATTORNEY

  
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Charles J. Sclafani, Jr.  
Bar No: 550411

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**CERTIFICATE OF SERVICE**

I, Charles J. Sclafani, Jr., attorney for the Defendant, hereby certify that on this 21st day of November, 2005, I served a copy of the foregoing **DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS**, via in hand service to Kevin O'Regan, Esq., Assistant United States Attorney.

  
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Charles J. Sclafani, Jr.